

MEMO ENDORSED**SPIVAKLIPTON LLP**

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 05/03/2023

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May 3, 2023

Via ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: **United Scenic Artists, Local USA 829, IATSE v.
Paradise Square Broadway Limited Partnership and Bernard Abrams
Case No. 1:22-cv-05704 (VEC)**

Dear Judge Caproni:

This firm represents Plaintiff in the above-referenced case. On April 6, 2023, the Court issued an Order closing this case in light of the parties reaching a settlement in principle and providing the parties with thirty days to apply to reopen the case. (ECF No. 55.) Pursuant to Rule 2.C of Your Honor's Individual Practices in Civil Cases, I write to request that the deadline for the parties to apply to reopen the case be extended by two weeks, from May 6, 2023 to May 20, 2023.

Plaintiff requests this adjournment because the parties need additional time to finalize and execute a settlement agreement. Plaintiff's counsel sent a draft settlement agreement to Defendants' counsel and is awaiting a response.

Plaintiff's counsel emailed Defendants' counsel on May 1 to ask if Defendants had any objection to this request and has not received a response. No party has previously requested an extension of this deadline.

Respectfully submitted,

SPIVAK LIPTON LLP



Nicholas J. Johnson
Counsel for Plaintiff

cc (via ECF): All Counsel of Record

Application GRANTED. The deadline for the parties to apply to reopen the case is hereby extended from May 6, 2023 to **May 20, 2023**. **The Court is unlikely to grant any further extension requests.**

SO ORDERED.

Valerie Caproni 05/03/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE